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10 **UNITED STATES DISTRICT COURT**

11 **SOUTHERN DISTRICT OF CALIFORNIA**

12 TAGHA THEODOSIA ABECK,
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14 Petitioner,
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16 v.
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18 CHRISTOPHER J. LAROSE,
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20 Respondents.
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Case No.: 26-cv-03745-JO-SBC

**RETURN TO PETITION FOR
WRIT OF HABEAS CORPUS**

Petitioner filed a Petition for Writ of Habeas Corpus on June 26, 2026. ECF No. 1.
On June 26, 2026, the Court issued an order directing “The government's return shall
identify and address any individualized concerns regarding Petitioner's danger to the
community or flight risk, including the factual basis for any such concerns.” ECF No. 2.
Respondents provide the following information pursuant to the Court’s June 26, 2026 order
to highlight Petitioner’s flight risk. Petitioner is a citizen and national of Cameroon. *See*
Exhibit 1 (Form I-213). Petitioner was detained for unlawful entry when Petitioner entered
the United States on foot. *Id.* There is no evidence that Petitioner has family in the United

1 States and there is only limited evidence of community ties. *Id.* Lastly, Petitioner was
2 previously ordered removed to Uganda. *See* Exhibit 2 (Removal Order).

3 Petitioner is subject to mandatory detention under 8 U.S.C. § 1225(b). *See Jennings*
4 *v. Rodriguez*, 583 U.S. 281 (2018). However, the government acknowledges that courts in
5 this District have repeatedly inferred a constitutional right against prolonged mandatory
6 detention. Taking into consideration those prior rulings and the length of time Petitioner
7 has been in custody, the government concedes that this Court should order that Petitioner
8 receive a bond hearing, where the government would bear the burden of proof of
9 establishing, by clear and convincing evidence, that Petitioner poses a danger to the
10 community or a risk of flight. *See Sadeqi v. LaRose*, No. 25-cv-2587-RSH-BJW, 2025 WL
11 3154520 (S.D. Cal. Nov. 12, 2025); *Gao v. LaRose*, No. 25-cv-2084-RSH-SBC, 2025 WL
12 2770633 (S.D. Cal. Sept. 26, 2025).

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14 DATED: July 2, 2026

Respectfully submitted,

15 ADAM GORDON
16 United States Attorney

17 *s/ Jacob T. Metzger*
18 JACOB T. METZGER
19 Special Assistant U.S. Attorney
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